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March 6, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

FILED/ACCEPTED
MAR - 8 2007
Federal Communications Commission
Office of the Secretary

Re: **Sunset of AMPS Requirement**
WT Docket No. 01-108 and RM 11355, Ex Parte Submission

Dear Ms. Dortch:

United States Cellular Corporation ("USCC"), a party in the above referenced proceeding, hereby comments on certain allegations made in the proceeding by the **Alarm Industry** Communications Committee ("AICC") in its original Petition for Rulemaking ("Petition") and reply comments, which evidently have been referred to **recently** in conversations between other parties to **this** proceeding and FCC staff members.

AICC's Petition (**pp. 13-14**) states as follows:

"However, there are certain areas in which there is poor digital cellular coverage leaving no alternative to the AMPS radios. **For** instance, several locations in Virginia, Iowa, Illinois, Connecticut, and Arizona have been identified where the digital coverage **is** significantly inferior to analog coverage, including Peoria and Dunlap, Illinois; West Hartford and Old Greenwich, Connecticut; Roanoke, Virginia; Des Moines, Iowa; and portions of **Arizona**. In these areas installation of digital [alarm] equipment would **lead** to poor or no service putting alarm customers at risk that **their** signal could not be transmitted."

USCC, **through** subsidiaries, provides A block analog and CDMA digital cellular **service** in the **Des Moines**, Iowa; Peoria, Illinois and Roanoke, Virginia MSAs, locations referred to by **AICC** in **its** pleadings. **The Des Moines MSA** is comprised of Dallas, Polk **and** Warren **counties**. USCC now has 15 **base** stations providing CDMA service in Dallas County, **56** base stations in Polk County, and 11 cells in Warren County. The Peoria MSA includes Peoria, Tazewell, and

Ms. Marlene H. Dortch

March 6, 2007

Page 2

Woodford counties. USCC's cells providing CDMA digital **service** in those counties number 27, 7 and 15 respectively. Lastly, the Roanoke **MSA** is comprised of Botetourt County, Craig County, Roanoke County, Roanoke City, and Salem City. The number of cells providing CDMA digital coverage in those jurisdictions is 5, 1, 10, 14, and 3 respectively. USCC's CDMA signal contour covers all of those MSAs and is fully equal to **its current** analog coverage.

USCC has argued, as have other wireless carriers, that the analog **sunset** should not be extended. But however the Commission resolves the overall **sunset** issue, ~~an~~ alleged lack of CDMA digital coverage as compared with analog **service** in the counties referred to above should not be a reason for extending the sunset.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Peter M. Connolly', with a long horizontal flourish extending to the right.

Peter M. Connolly

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